

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES A. BURK, JR., et al.,

Plaintiffs,

v.

CITY OF COLUMBUS, et al.,

Defendants.

Case No. 2:20-cv-6256

Judge James L. Graham

Magistrate Judge Chelsey M. Vascura

DEFENDANTS' PROPOSED QUESTIONS FOR VOIR DIRE

1. Have you ever seen, read, or heard any stories about this incident?
2. Knowing the subject of this case, is there anyone who is uncomfortable sitting on this jury?
3. Knowing the subject of this case, is there anyone who really wants to sit on this jury?
4. Most of us have received a traffic citation at some point in our lives and some of us (or at least a family member or friend) may have been arrested. If so, was there anything about that experience which might make it difficult for you to render a fair and impartial verdict?
5. How would you rate your experience with the police in your community on a scale from 1-5? 1 being very negative experience and 5 being very positive experience. 3 being neutral.
6. Have you had any interactions with the Columbus Division of Police?
7. For those that have had interactions with the Columbus Division of Police how would you rate your experience on a scale from 1-5? 1 being very negative experience and 5 being very positive experience. 3 being neutral.
8. Has anyone personally had or someone close to you had an interaction with law enforcement that causes you to distrust law enforcement?
9. Has anyone formed an opinion about the criminal justice system or policing that would prevent you from being a fair juror.
10. Do the police in your community make you feel mostly safe or mostly anxious?

11. Which would you prefer in your community?
 - a. A larger police presence than currently exists?
 - b. No change in police presence?
 - c. A smaller police presence than currently exists?
12. Which of the following best describes your view about changes that may or may not need to be made to policing in the United States?
 - a. Major changes are needed
 - b. Minor changes are needed
 - c. No changes are needed
13. Have you ever been mistreated by the police?
 - a. (If so) Have you ever been mistreated by anyone associated with the Columbus Division of Police?
14. Do you personally know anyone who was mistreated by the police?
 - a. (If so) Do you personally know anyone who was mistreated by anyone associated with the Columbus Division of Police?
15. Have you taken any steps in response to policing issues?
 - a. Protesting
 - b. Conversations
 - c. Writing letters
 - d. Social media postings
 - e. Attending or participating in any public meetings about policing
16. Are you a participant in any social justice or civil rights movements or organizations (such as the People's Justice Project, Black Lives Matter, Showing Up for Racial Justice)?
17. Anyone that believes testimony from a police officer is less credible simply because of their chosen profession?

Respectfully submitted,

/s/ Sheena D. Rosenberg

Alexandra N. Pickerill (0096758) – LEAD

Sheena D. Rosenberg (0088137)

Sarah N. Feldkamp (0099464)

Assistant City Attorneys

CITY OF COLUMBUS, DEPARTMENT OF LAW

77 N. Front Street, Columbus, Ohio 43215

Phone: (614) 645-6945 / Fax: (614) 645-6949

anpickerill@columbus.gov

sdrosenberg@columbus.gov

snfeldkamp@columbus.gov

*Counsel for Defendants Joseph Fihe and
Kevin Winchell*

CERTIFICATE OF SERVICE

I hereby certify that, on **October 29, 2024**, I electronically filed the foregoing with the Clerk of this Court by using the Court's CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

/s/ Sheena D. Rosenberg

Sheena D. Rosenberg (0088137)